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16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**

19 ANSHUMAN SINGH, *et. al*,  
20 individually and on behalf of all others  
21 similarly situated,

22 Plaintiffs,

23 v.

24 FCA US LLC, *et al.*,

25 Defendants.

Case No. 4:23-cv-00452-HSG

**STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO FIRST  
AMENDED COMPLAINT**

1 Plaintiffs and Defendant FCA US LLC stipulate to an extension of time for  
2 FCA US to respond to Plaintiffs' First Amended Class Action Complaint ("FAC")  
3 based on the following facts:

4 1. Plaintiffs filed their FAC on April 20, 2023, and it more than doubles the  
5 number of named plaintiffs, the claims asserted, and states at issue.

6 2. Twenty-one named plaintiffs assert seventy-two causes of action on  
7 behalf of putative nationwide and state-based sub-classes, alleging claims for fraud,  
8 breach of express and implied warranties, unjust enrichment, and statutory violations  
9 under sixteen states' laws.<sup>1</sup>

10 3. FCA US's response to the FAC is due on May 4, 2023, but it needs more  
11 time to review and evaluate the FAC's new claims (thirty-seven), plaintiffs (thirteen),  
12 and states' laws at issue (eight).

13 4. Because of the time necessary to address the newly-added material, and  
14 because of the press of other business, including overlapping briefing obligations and  
15 deadlines, FCA US requested from Plaintiffs' counsel more time to respond to the  
16 FAC. As the Parties conferred, they also agreed that, if FCA US moves to dismiss  
17 the FAC, Plaintiffs would need additional time to prepare its opposition.

18 5. Accordingly, the Parties request that the Court approve their stipulation  
19 on the time for FCA US's response to Plaintiffs' FAC and a briefing schedule for any  
20 motion to dismiss that FCA US may file.

21 **THE PARTIES HEREBY STIPULATE**, subject to the Court's approval,  
22 that:

23 1. FCA US shall answer, move, or otherwise plead to the FAC by **May 25,**  
24 **2023.**

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27 <sup>1</sup>California, Colorado, Illinois, Massachusetts, Michigan, Minnesota, Missouri,  
28 Nebraska, New Hampshire, New Jersey, New York, Oklahoma, Oregon,  
Pennsylvania, Vermont, and Wisconsin.

- 1           2.     If FCA US files a motion to dismiss as its response, Plaintiffs shall file  
2                 any opposition by **June 22, 2023**, and FCA US shall file any reply by  
3                 **July 13, 2023**.
- 4           3.     The hearing on any motion to dismiss directed at the FAC shall be set  
5                 for **July 27, 2023** at 2:00 p.m., or as the Court otherwise determines.

6  
7 DATED: April 28, 2023     **KLEIN THOMAS LEE & FRESARD**

8  
9 By: /s/ Kristyn Wong  
10         Gregory P. Gilmer  
11         Kristyn Wong

12                 **THOMPSON COBURN LLP**

13                 Stephen A. D'Aunoy (to be admitted *pro hac vice*)  
14                 Scott H. Morgan (to be admitted *pro hac vice*)

15                 *Attorneys for Defendant FCA US LLC*

16 DATED: April 28, 2023     **KELLER ROHRBACK L.L.P.**

17 By: /s/ Ryan McDevitt  
18         Matthew J. Preusch  
19         Gretchen Freeman Cappio (*pro hac vice*)  
20         Ryan McDevitt (*pro hac vice*)  
21         Emma Wright (*pro hac vice*)

22                 **THE MILLER LAW FIRM**

23                 E. Powell Miller (*to be admitted pro hac vice*)  
24                 Sharon S. Almonrode (*to be admitted pro hac vice*)  
25                 Dennis A. Lienhardt, Jr. (*to be admitted pro hac vice*)

26                 *Attorneys for Plaintiffs*

27                 \*I, Kristyn Wong, attest that all other signatories listed, and on whose behalf  
28                 the filing is submitted, concur in the filing's content and have authorized the filing.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2023, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

/s/ Kristyn Wong

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17 **UNITED STATES DISTRICT COURT**

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20 individually and on behalf of all others  
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22 Plaintiffs,

23 v.

24 FCA US LLC,

25 Defendant.


Case No. 4:23-cv-00452-HSG

26 **ORDER GRANTING**  
27 **STIPULATION RE: RESPONSE TO**  
28 **FIRST AMENDED COMPLAINT**

1 Before the Court is the Parties' stipulation on a proposed extension of time for  
2 Defendant FCA US LLC to respond to Plaintiffs' First Amended Class Complaint  
3 ("FAC"). For good cause shown, and **PURSUANT TO THE PARTIES'**  
4 **STIPULATION, THE COURT ORDERS AS FOLLOWS:**

- 5 1. FCA US shall answer, move, or otherwise plead to the FAC by May 25,  
6 2023.
- 7 2. If FCA US files a motion to dismiss as its response, Plaintiffs shall file  
8 any opposition by June 22, 2023, and FCA US shall file any reply by  
9 July 13, 2023.
- 10 3. The hearing on any motion to dismiss directed at the FAC shall be set for  
11 July 27, 2023 at 2:00 p.m., or as the Court otherwise determines.

12  
13 Date: May 1, 2023

  
14 Honorable Haywood S. Gilliam, Jr.  
15 United States District Court Judge  
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